UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK	
KELLEY AMADEI, CAROLA CASSARO, LAURA CUCULLU, COREY FIELDS, ANNE GARRETT, AMY LANIGAN, MATT O'ROURKE, ERIC POLK, and KAREN POLK,	NOTICE OF MOTION
Plaintiffs,	RENEWING THE REQUEST TO STAY DISCOVERY
V.  KIRSTJEN M. NIELSEN, Secretary of Homeland Security, named in her official capacity,	Civil Action No. 17-CV-5967
KEVIN K. MCALEENAN, Acting Commissioner, U.S. Customs and Border Protection, named in his official capacity,	(Garaufis, J.) (Scanlon, M.J.)
LEON HAYWARD, Acting Director, New York Field Operations, U.S. Customs and Border Protection, named in his official capacity,	
FRANCIS J. RUSSO, Port Director, JFK International Airport Port of Entry, U.S. Customs and Border Protection, named in his official capacity,	
THOMAS HOMAN, Acting Director, U.S. Immigration And Customs Enforcement, named in his official capacity,	
THOMAS DECKER, Director, New York Field Office, Enforcement and Removal Operations, U.S. Immigration And Customs Enforcement, named in his official capacity,	
DAVID JENNINGS, Director, San Francisco Field Office, Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement, named in his official capacity,	
JOHN DOES 1 and 2, U.S. Customs and Border Protection officers, named in their official capacity,	
Defendants.	

PLEASE TAKE NOTICE that on the enclosed Memorandum of Law in Support of Defendants' Motion Renewing the Request to Stay Discovery, Defendants Kirstjen M. Nielsen, Kevin K. McAleenan, Leon Hayward, Francis J. Russo, Thomas Homan, Thomas Decker, and David Jennings (collectively, "Defendants") will move before the Honorable Nicholas G. Garaufis, at the United States Federal Courthouse, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, upon submission or on a date and time for oral argument to be set by this Court, for a stay of discovery pending a decision on their motion to dismiss for lack of subject matter jurisdiction and for failure to state a claim upon which relief can be granted, and for any such other and further relief as the Court deems just and proper.

Dated: Brooklyn, New York September 24, 2018

> RICHARD P. DONOGHUE United States Attorney Eastern District of New York Attorney for Defendants 271-A Cadman Plaza East, 7<sup>th</sup> Floor Brooklyn, New York 11201

By:

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cc: All counsel of record (Via ECF)